



February 23, 2015

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, New York 10007

***Re: United States vs. Ilya Petrov
15 CR 066 (LTS)***

Dear Judge Swain:

I respectfully write on behalf of my client, Ilya Petrov, in anticipation of his bail hearing scheduled for Wednesday, February 25, 2015.

Mr. Petrov was detained after a hearing before Magistrate Judge Sarah Netburn on January 26, 2015. The Government argued that Mr. Petrov should be detained on the issue of danger to the community, agreeing that he is not a risk of flight. At the bail hearing the Magistrate Judge applied the wrong standard in addressing my client's bail application. The standard that was applied was that this was a presumption of no bail, which was incorrect.

It is agreed that Mr. Petrov is not perceived as a flight risk and on February 10, 2015, I forwarded to the Government a proposed bail package signed by four (4) Sureties, please see attached as Exhibit "A". In addition, I submitted reference letters from people in the community that are fully acquainted with Mr. Petrov.

If the Court deems it necessary that other conditions are required, then in order to alleviate any concerns the Court may have with regard to my client's bail, then in the event I most respectfully propose together with the Bail Package that the Court allow Mr. Petrov to home confinement.

Mr. Petrov's Strong Roots In The Community

Mr. Petrov has no prior criminal record. He is married for the past 7 years and has 1 child, a 4/12 year old girl. He is a naturalized United States Citizen, who came to the United States with his parents in 1994. He became a citizen, approximately 11 years ago. His mother passed away in 2003 and his father resides in Kings County. Mr. Petrov is a jeweler by trade, he sold his jewelry business in Brooklyn in 2014. From the letters that were submitted he is well respected in his community.

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Mr. Petrov enlisted in the United States Marine Corps and received an Honorable Discharge in 2008.

The Offense

Mr. Petrov is charged in a two count Indictment with Conspiracy to Commit Extortion and Extortion. The alleged victim is a friend of Mr. Petrov. That this arises out of a real estate transaction that my client and co-defendant entered under the sound advice given to them by the Complainant. The alleged victim in this matter was involved in the purchase, the renovation, the refinance and the sale of the property. This property was eventually sold in December 2014 at a loss. My client during this period had several meetings with the alleged victim. At one of the meetings my client with the knowledge of the alleged victim recorded the meeting.

There was also a reference made as to an incident that occurred several years earlier regarding the victim's cousin that he was allegedly beaten. The Court should note that my client was never arrested for this incident and that the New York City Police Dept. felt that there was no Probable Cause to initiate an arrest.

Conclusion

Based on my client's background and strong ties to the community, we urge the court to grant a bail package requested.

Very truly yours,

JAKE LASALA, ESQ.

JL/sc

cc: Russell Capone, Esq.
 Assistant United States Attorney